

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

Celia Cuevas,)
)
Plaintiff,)
)
v.) Case No. 1:25-cv-4735
)
Medical Express Ambulance Services,)
Inc., d/b/a MedEx Ambulance)
)
Defendant.)

**DEFENDANT'S UNOPPOSED MOTION FOR A
SECOND EXTENSION OF TIME TO FILE RESPONSIVE PLEADING**

Defendant, Medical Express Ambulance Services, Inc., through its counsel, for its Unopposed Motion for a Second Extension of Time to File its Responsive Pleading to Plaintiff's Complaint, pursuant to Fed. R. Civ. Proc. 6, respectfully requests an extension of an additional thirty days (until August 4, 2025) to answer or otherwise plead in response to Plaintiff's Complaint, and states as follows:

1. On April 30, 2025, Plaintiff filed this putative class action lawsuit asserting various claims arising out of a cybersecurity incident that occurred in March 2024 (the "Incident").
2. On May 13, 2025, Plaintiff served the lawsuit on Defendant's registered agent, making Defendant's responsive pleading due on June 3, 2025.
3. Several purported class action lawsuits have been filed against Defendant in the Circuit Court of Cook County asserting the same or similar claims arising out of the Incident, including:
 - i. *Dixon v. Medical Express Ambulance Service, Inc.*, No. 2025CH04441, filed on April 21, 2025;
 - ii. *Long v. Medical Express Ambulance Service, Inc.*, No. 2025CH04521, filed on April 23, 2025;

- iii. *Eller v. Medical Express Ambulance Service, Inc.*, No. 2025CH04528, filed on April 23, 2025;
- iv. *Gorski v. Medical Express Ambulance Service, Inc.*, No. 2025CH04560, filed on April 23, 2025; and
- v. *Glenn v. Medical Express Ambulance Service, Inc.*, No. 2025CH04621, filed on April 25, 2025 (collectively, the “Cook County Actions”).

4. On May 28, 2025, the Circuit Court of Cook County, Chancery Division, granted a motion to consolidate the Cook County Actions.

5. Counsel for the parties in this federal case are conferring about consolidating this case with the Cook County Actions as well.

6. On June 2, 2025, Defendant filed its first motion for a 30-day extension of its responsive pleading deadline while the parties confer regarding consolidation of this case with the Cook County Actions.

7. On June 3, 2025, this Court granted Defendant’s motion and extended Defendant’s responsive pleading deadline to July 3, 2025.

8. On June 13, 2025, the Circuit Court of Cook County granted a motion to appoint interim lead class counsel in the Cook County Actions and ordered the plaintiffs to file a consolidated complaint by July 28, 2025.

9. Defendant requests an extension of its responsive pleading deadline in this case to allow more time for the parties to confer on whether to consolidate this matter with the Cook County Actions, especially in light of the forthcoming July 28 date for filing a consolidated complaint in the Cook County Actions.

10. On June 23, 2025, Defendant inquired with Plaintiff’s counsel whether Plaintiff would agree to a further extension of Defendant’s responsive pleading date in this matter while the parties conferred regarding consolidation. Due to personnel changes among Plaintiff’s counsel and

vacation schedules, Plaintiff's counsel did not respond to Defendant's request for agreement to an extension until this week. Defendant would have filed this motion before July 3, 2025 except that it was waiting for Plaintiff to respond to Defendant's request.

11. Counsel for Plaintiff confirmed that Plaintiff does not oppose this motion.

WHEREFORE, Defendant, Medical Express Ambulance Services, Inc., respectfully requests that this Honorable Court grant Defendant's Unopposed Motion for an Extension of Time, grant Defendant a second extension of thirty days, until August 4, 2025, to answer or otherwise plead in response to Plaintiff's Complaint, and grant any further relief that this Honorable Court finds just and appropriate.

Respectfully submitted,

Medical Express Ambulance Services, Inc.

By: /s/ Brian H. Myers
One of its attorneys

Brian H. Myers (ARDC# 6305867)
WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP
1500 K Street NW, Suite 330
Washington, DC 20005
Phone: (202) 626-7695
Facsimile: (202) 628-3606
brian.myers@wilsonelser.com

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of July, 2025, I electronically filed the foregoing with the Clerk of Court using the ECF system, which will send notification of such filing all ECF participants.

/s/ Brian H. Myers